

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

FILED

MAY 11 2015

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

St. Louis County,)	
)	
Plaintiffs,)	
vs.)	State Court:
)	Case No.'s 14188551,
Carl and Carol Johnson)	14188552-01
)	14188552-02
Defendants.)	

MOTION FOR INJUNCTION
AGAINST
MR. ROBSON, ST. LOUIS COUNTY COUNSELOR

Comes Now, Defendants, Carl and Carol Johnson and files their 'Motion for Injunction Against Mr. Robson, St. Louis County Counselor' for the following reasons:

1. On April, 8, 2014, Carl and Carol Johnson received an arrest notification for assault.
2. On April 22, 2015, Mr. Robson, County Counselor made an inaccurate statement to the Judge in the St. Louis County Municipal Court that Defendant Carol Johnson had taken an 'Alford Plea' in a previous case, #M1111095 which the Court in the St. Louis County Municipal took into consideration.
3. On April 27, 2015, Defendants attorney filed a 'Motion for Consideration' asking the St. Louis County Municipal Court to consider that Mr. Robsons statements were inaccurate and not to consider what the St. Louis County Counselor stated.
4. To date, the St. Louis County Municipal Court has not ruled on said 'Motion for Consideration'.
- %. Due to inaccurate information of slander against defendant Carol Johnson by Mr. Robson, St. Louis County Counselor, Carol Johnson has been affected by Mr. Robsons incorrect information which, apparently, has led to an illegal judgment convicting defendant Carol Johnson for assault which defendant Carol

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Johnson never committed. This was even confirmed by Carla Shook in her deposition of April 2, 2015 when defendants attorney asked Carl Shook if Carol Johnson assaulted her and Carla Shook said "No". (exhibits B1 and B2).

6. St. Louis County never produced any witnesses nor accusers against her but because of the slander of Mr. Robson, St. Louis County Counselor to the Municipal Court, Carol Johnson suffered damages of 2 convictions of assault she never committed.

WHEREFORE, Defendants Carl and Carol Johnson pray their 'Motion for Injunction against Mr. Robson, St. Louis County Counselor be Granted and pray defendant Carol Johnson is granted the relief of an injunction against Mr. Robson, St. Louis County Counselor.

Respectfully Submitted,

Carl Johnson (Carl) Johnson

Carl Johnson, Pro-Se
1901 Ashby Road
St. Louis, Missouri 63114
(314) 426-4409

[Signature]
~~Carol Johnson, Pro-Se~~
1901 Ashby Road
St. Louis, Missouri 63114
(314) 426-4409

CERTIFICATE OF SERVICE

This is to certify that the above 'Motion for Injunction Against Mr. Robson, St. Louis County Counselor' is served upon Mr. Robson, attorney for plaintiffs on this 11 day of May, 2015 by U. S. First Class Mail at St. Louis County Government-St. Louis County Counselors Office at 41 S. Central-9th Floor in Clayton, Missouri 63105

IN THE ST. LOUIS COUNTY MUNICIPAL COURT
SOUTH DIVISION-ST. LOUIS COUNTY

ST. LOUIS COUNTY	Plaintiffs)	
)	
vs.)	Case #14188552-01
)	
CAROL I. JOHNSON	Defendant)	
)	
)	


MOTION FOR CONSIDERATION

Comes Now, Rhonnie Hemphill, and files this Motion for Consideration prior to the rendering of a decision for the above-styled causes for the following reasons:

1. On April 22, 2015, the Court held a trial for the above cases.
2. The County Counselor told the Court that the defendant Carol Johnson made an 'Alford Plea' in a previous case, which was inaccurate information (Case #M1111095). Judge Adler never signed any Alford Plea order for the above-styles case numbers.
3. This court may have relied on the incorrect information regarding the Alford Plea provided by the County Counselor during the trial on the above causes in April 2015.
4. Defendant does not want this Court to consider any statements made by the County Counselor's office regarding the Alford Plea in a previous case.

WHEREFORE, through their attorney, the defendant prays that this Motion for Consideration is granted.

Respectfully Submitted,


Mr. Rhonnie Hemphill
The Hemphill Law Office, LLC
1027 S. Vandeventer Avenue
Suite 600
St. Louis, Missouri 63110
Bar #62935

FILED

APR 27 REC'D

Rence Hines-Tyce
Court Administrator
St. Louis County Municipal Courts

CERTIFICATE OF SERVICE

This is to certify that the above Motion for Consideration is served upon Mr. Steven Robson, St. Louis County Counselor by First Class Mail at 41 South Central, Ninth Floor in Clayton, Missouri, 63105 this 27 day of April, 2015.



IN THE ST. LOUIS COUNTY MUNICIPAL COURT
SOUTH DIVISION
ST. LOUIS COUNTY
ORIGINAL
ST. LOUIS COUNTY

VS.

CAROL I. JOHNSON,

Case No. 14188552-01

Case No. 14188552-02

And

ST. LOUIS COUNTY

VS.

CARL M. JOHNSON

Case No. 14188551

DEPOSITION OF CARLA SHOOK
APRIL 2, 2015

NATIONWIDE SCHEDULING

OFFICES

MISSOURI: Springfield, Jefferson City, Kansas City, Columbia, Rolla, Cape Girardeau
KANSAS: Overland Park, LENOIS: Springfield, Champaign

HEADQUARTERS: 711 North Eleventh Street, St. Louis, Missouri 63101

800.280.3376

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EXHIBIT
B1

1 Q. Six. Were they forward and back hand
2 slaps or how? Tell me how.

3 A. Both hands. Right, left, right, left,
4 right, left.

5 Q. Okay. When this occurred, the slapping
6 by Carl, what did Carol Johnson do?

7 A. Continued screaming and kicked the baby
8 stroller.

9 Q. You said kicked the baby stroller is
10 what you said?

11 A. Yes.

12 Q. Did you have any conversations with the
13 EMS personnel?

14 A. No.

15 Q. When the ambulance came? Nothing?
16 None of that?

17 A. (Nonverbal response.)

18 Q. Okay. Did Carol Johnson assault you?

19 A. Carol?

20 Q. Yes, Carol.

21 A. No.

22 Q. Are you aware that this -- I know you
23 previously said, excuse me, that you're not aware of
24 any property disputes that's going on between any of
25 the neighbors and the Johnson's. Is that correct?